

EXHIBIT D

In the Matter Of:

Haran vs

Orange Business Services Inc.

PATRICIA HARAN

April 26, 2023



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x
PATRICIA HARAN,

Plaintiff,

Index No.:
1:21-CV-10585-VSB

-against-

ORANGE BUSINESS SERVICES INC.,

Defendant.

- - - - -x

IN-PERSON DEPOSITION

OF

TAKEN ON: April 26, 2023

- - - - -x

A P P E A R A N C E S:

FISHER TAUBENFELD LLP
Attorneys for Plaintiff
225 Broadway, Suite 1700
New York, New York 10007

BY: LIANE FISHER, ESQ.
liane@fischertaubenfeld.com

BAKER HOSTETLER
Attorneys for Defendant
45 Rockefeller Plaza, 14th Floor
New York, New York 10111

BY: JUSTIN A. GUILFOYLE, ESQ.
jguilfoyle@bakerlaw.com

AMY I TRAUB, ESQ.

- o o o -

P A T R I C I A H A R A N ,

having been first duly sworn by a Notary

Public of the State of New York was examined and

testified herein:

- o o o -

1 P. HARAN

2 during your employment of Level 3 or
3 Lumen?

4 A. No.

5 Q. When were you hired by Orange
6 Business Services -- and just for the
7 record, I'm going to be referring to
8 Orange Business Services NA, Inc. as
9 Orange or OBS throughout the deposition;
10 is that okay?

11 A. Yes.

12 Q. So when were you hired by
13 Orange?

14 A. I was hired -- I believe it
15 was May of 2017.

16 Q. And what was the position for
17 which you were hired?

18 A. Account manager.

19 Q. Does it have a specific title
20 at Orange?

21 A. I believe it was account
22 manager --

23 Q. Okay.

24 A. -- was the technical title.

25 Q. Do you recall if you signed

1 P. HARAN

2 2017?

3 A. Yes.

4 Q. Did you always have the same
5 role throughout your entire tenure at
6 Orange?

7 A. Yes.

8 Q. So you never changed roles?

9 A. No. As far as titles, you
10 know, if that's what you mean -- titles
11 is -- has -- did not change.

12 Q. Did your responsibilities
13 change at any time while at Orange?

14 A. Just accounts that I was
15 working on would have changed.

16 Q. When did that change?

17 A. Probably several times over my
18 tenure there. You know, just sort of
19 like somebody resigned, so we need you
20 to take on these accounts, and also work
21 on your other accounts, we're going to
22 move that account to somebody else, that
23 kind of thing.

24 Q. Did there ever come a time
25 where you started taking on more

1 P. HARAN

2 responsibilities for A-end accounts?

3 A. Yeah. Yeah. That was part
4 of -- somebody left, somebody resigned.
5 And I was asked to handle some of her
6 A-end accounts during -- because she had
7 left the company.

8 Q. So that's not something that
9 you requested to take on?

10 A. Well, at that time it was
11 brought to me. I mean, over the years I
12 had spoken about the potential of
13 working on A-end accounts, yes, but
14 these particular accounts, you know, I
15 was asked to work on them because the
16 person who had them had resigned from
17 the company.

18 Q. Do you recall about when that
19 was?

20 A. I recall not exactly sure, but
21 I want to say it was in the January
22 of 20 -- I guess it would have been
23 January of 2020 timeframe, I believe.

24 Q. And who is the person that
25 left that you're referring to?

1 P. HARAN

2 A. Lorna Paine.

3 Q. I'm going to show you the
4 documenter. Mark this as Haran 2.

5 (Whereupon, Bates OBS13 was marked as
6 Exhibit 2 for identification, as of
7 April 26th, 2023.)

8 MR. GUILFOYLE: For the
9 record, this is a one-page document
10 bearing Bates OBS 13.

11 Q. Ms. Haran, do you recognize
12 this document?

13 A. Vaguely, I recognize it. I
14 mean, it says Employee Handbook
15 acknowledgment for the United States.
16 So, I mean, I think there was a big pile
17 of paper that I signed when I went on
18 board and I'm sure this was one of them.
19 I don't specifically recall it, but it's
20 my signature.

21 Q. Okay. That's dated May 11,
22 2017?

23 A. Yes.

24 Q. I'm going to show you another
25 document that will be marked as Haran 3.

1 P. HARAN

2 (Whereupon, a document was marked as
3 Exhibit 3 for identification, as of
4 April 26th, 2023.)

5 Q. And do you recognize this
6 document as one of those documents you
7 mentioned that you signed when you were
8 onboarding?

9 A. I don't recognize it in
10 particular, but it is my signature and
11 like I said there was a big pile of
12 papers that I was asked to sign when I
13 was onboarded.

14 Q. Okay. That signature is dated
15 May 18, 2017?

16 A. Yes.

17 Q. Who did you report to during
18 your employment with Orange?

19 A. I reported to Adam Kimmick.

20 Q. Do you know Adam Kimmick's
21 title?

22 A. Sales director. Head of
23 sales, I think. I'm not sure.

24 Q. Okay. What.
25 (Simultaneous speaking.)

1 P. HARAN

2 A. Sales director.

3 Q. Was that for a specific region
4 of the United States?

5 A. He was responsible for the
6 northeast and the midwest regions.

7 Q. Did you report to anyone else?

8 A. No.

9 Q. During your employment at
10 Orange, did you receive performance
11 evaluations?

12 A. Yes.

13 Q. Did you meet with anyone to
14 discuss those performance evaluations?

15 A. Yes.

16 Q. And who was that?

17 A. Adam Kimmick.

18 Q. Anyone else?

19 A. No.

20 Q. I'm going to show you a
21 document that will be marked as Haran 4.

22 (Whereupon, BATES OBS334 - 343 was
23 marked as Exhibit 4 for identification,
24 as of April 26th, 2023.)

25 MR. GUILFOYLE: And for the

1 P. HARAN

2 record this is a document bearing Bates
3 OBS334 through 343.

4 Q. Ms. Haran, do you recognize
5 this document?

6 A. Let me just take a look here.

7 Q. Take your time.

8 A. Okay.

9 Q. Okay. And do you recognize
10 this document?

11 A. I do.

12 Q. And what is this document?

13 A. A performance review.

14 Q. And is this for the first half
15 of 2020?

16 A. Yes. It appears to be.

17 Q. Do you know who created this
18 performance review?

19 A. It was created by Adam Kimmick
20 and myself.

21 Q. Okay. And if I could just
22 bring your attention --

23 A. I mean it was filled in, I
24 would say, by us. It wasn't created by
25 us. It was created by a company, I

1 P. HARAN

2 assume. It's a performance review plan
3 that I think everybody fills in, but it
4 was populated by myself and Adam.

5 Q. So the templates for the
6 performance review was created by
7 Orange?

8 A. Correct.

9 Q. And then the contents of what
10 went in there specific to you were
11 inputted by Adam and yourself?

12 A. Correct, yes.

13 Q. Okay. If I can bring your
14 attention to page 8 of 10, if you look
15 on the lower right corner.

16 A. Lower right corner.

17 Q. Yes, so now if I bring your
18 attention to where it says manager's
19 comments, do you see that at the top of
20 the page?

21 A. Yes.

22 Q. Okay. Could you read the
23 first two sentences under manager's
24 comments for me?

25 A. Yes. "First half 2020 was a

1 P. HARAN

2 challenge for Patty in her new
3 territory. Results on revenue were in
4 line with the expectations that fell
5 short of target in both keep and new and
6 get orders."

7 Q. What is the next sentence
8 there?

9 A. "Her qualified pipeline is not
10 currently sufficient to meet her 2020
11 financial objectives, and the new
12 opportunities created in 2019 with her
13 B-end accounts exploring partnership and
14 sell with opportunities to expand our
15 portfolio, have not yet matured as ample
16 opportunities."

17 Q. Okay. What does it mean that
18 your qualified pipe library is not
19 currently sufficient to meet 2020
20 financial objectives?

21 A. Well, I mean I'd be
22 speculating on what Adam means there; is
23 that what would you like for me to do?

24 Q. Sure. What is your
25 understanding of what that means?

1 P. HARAN

2 A. My understanding is that
3 pipeline is a sales forecast and
4 typically sales forecasts, you know, are
5 larger than what the quota is that's
6 assigned. And so when he's saying that
7 he thinks that my pipeline is not, you
8 know, his words here, my pipeline is not
9 sufficient, then he doesn't feel that I
10 have enough opportunities in my sales
11 forecast to meet my target quota for
12 2020.

13 Q. If we could turn to the next
14 page, please?

15 (Witness complies.)

16 Q. And do you see where it says
17 acknowledgment by the employee the 30th
18 of July 2020?

19 A. Yes.

20 Q. Okay. Do you recall having
21 completed the performance review on or
22 about July 30, 2020?

23 A. Yes.

24 Q. And is that typical for
25 first-half performance reviews to be

1 P. HARAN

2 done towards the end of July, in your
3 experience?

4 A. I don't know. I'd have to --
5 you know, I really don't know. I mean
6 typically they'd be done somewhere
7 around the end of the first half, so it
8 seems a little late, but that's just,
9 you know, it's probably -- it's
10 probably, you know, it could be done
11 earlier in June or something, so, but,
12 you know, it's not -- it seems to be at
13 the end of July, so.

14 Q. Okay. I'm going to show you
15 another document.

16 MR. GUILFOYLE: For the
17 record, this will be Haran 5.

18 (Whereupon, BATES OBS344 - 353 was
19 marked as Exhibit 5 for identification,
20 as of April 26th, 2023.)

21 Q. I just ask that you take a
22 moment and look through that document,
23 please.

24 MR. GUILFOYLE: For the
25 record, it's OBS344 through 353.

1 P. HARAN

2 Q. Do you recognize this
3 document?

4 A. Yes.

5 Q. What do you recognize it to
6 be?

7 A. A performance review.

8 Q. Do you know who input the
9 substance of text within this review?

10 A. Yes.

11 Q. Who was that?

12 A. Adam Kimmick and myself.

13 Q. If I could bring your
14 attention to the page identified by nine
15 out of ten. Can you tell me what the
16 overall rating is there?

17 A. Yes. The rating is two,
18 improvement needed.

19 Q. Okay. And with the evaluation
20 process at Orange, you were given the
21 opportunity to respond to your manager's
22 comments and conclusions in here, right?

23 A. Correct.

24 Q. Okay. And it looks like you
25 did so below the manager's comments here

1 P. HARAN

2 on this page?

3 A. Yes.

4 Q. Okay. Did you note anywhere
5 in this performance review that you
6 believed your improvement needed rating
7 was due to you having taken time off in
8 connection with your daughter's or your
9 mother's illness?

10 A. Could you repeat the question?

11 Q. Sure.

12 MR. GUILFOYLE: Could you read
13 that back for me?

14 (Whereupon, the requested portion was
15 read back by the reporter.)

16 A. No, it's -- I don't see that
17 in here.

18 BY MR. GUILFOYLE:

19 Q. Do you see anything on this
20 page about your lack of focus?

21 A. There's just a comment that
22 says, "urgent focus, it needs to be on
23 identifying new opportunities and moving
24 these progressively through the
25 pipeline." It's the last sentence.

1 P. HARAN

2 A. It was -- we did discuss it,
3 yes. I brought it up to him and said
4 you know again like I've mentioned in my
5 earlier statement, you know, I was
6 dealing with the -- my mother -- my
7 daughter's illness. I was dealing with
8 all of the events that were preceding
9 that and that it was difficult for me
10 to, you know, juggle that along with
11 everything else that my responsibilities
12 were for the job.

13 MR. GUILFOYLE: Okay. I'm
14 going to move to strike the nonresponsive
15 answer.

16 Q. The question was: Did
17 Mr. Kimmick say anything about you
18 taking time off in connection with your
19 daughter's or mother's illness; not if
20 you said anything?

21 A. He did not bring it up, but he
22 responded to my bringing it up, did
23 that --

24 Q. Makes sense?

25 A. Makes sense.

1 P. HARAN

2 Q. So what makes you think that
3 your two rating here has anything to do
4 with the days you take off in connection
5 with your daughter's illness in October?

6 A. Well, the focus commentary
7 that we had, and in the conversation
8 that the lack of focus was his
9 assessment around why he thought that I
10 was not able to -- to meet the objective
11 in this -- in this overall rating.

12 Q. And do you believe you had
13 a -- you did indeed have a lack of focus
14 during this time?

15 A. Yeah, I mean, it was something
16 that was -- it was something that I was
17 trying to work through, and, you know,
18 balance as best as I could to do the
19 right thing for the company, to do the
20 right thing to advance all of my sales,
21 and also, you know, manage my daughter's
22 illness and all -- everything that was
23 associated with that, so yeah.

24 Q. Let me show you another
25 document.

1 P. HARAN

2 Q. What do you recognize it to
3 be?

4 A. I actually -- I mean, I
5 recognize it now. I hadn't -- it's been
6 a while since, you know, I wrote this,
7 so I recognize it to be a correspondence
8 between Michelle Rocco and myself.

9 Q. Okay. And in these emails did
10 you request any sort of leave for any
11 time off from Michelle Rocco?

12 A. No.

13 Q. Okay. How did you come to
14 learn that your employment at Orange had
15 been terminated?

16 A. I was invited to a call, I
17 believe it might have even been my
18 weekly -- I don't know, it was a call
19 that I was invited to by Adam Kimmick,
20 WebEx.

21 Q. A virtual meeting type thing?

22 A. Yes.

23 Q. And do you recall when that
24 was?

25 A. It was -- I believe, it was

1 P. HARAN

2 February 24, 2021.

3 Q. And do you know where Adam was
4 during this meeting?

5 A. Physically?

6 Q. Yes.

7 A. I don't recall.

8 Q. Okay. Was anyone else present
9 at this meeting?

10 A. Yes.

11 Q. Who was that?

12 A. Jennifer Lawson.

13 Q. And who is Jennifer Lawson?

14 A. She's a human resources
15 manager or associate. I don't know her
16 title exactly.

17 Q. And did they provide a reason
18 for your termination during that
19 meeting?

20 A. There were two reasons
21 provided.

22 Q. And what were those two
23 reasons?

24 A. The reason number one, I
25 believe it was Adam who said -- well,

1 P. HARAN

2 Jennifer first said, as I recall, when I
3 asked her why I was terminated, she said
4 it was because you didn't make your 2020
5 quota or something along those lines.
6 Don't quote me exactly, but it was that
7 I didn't -- maybe it was my sales
8 achievement I don't know how she said
9 it, but it was my 2020 quota. And then
10 Adam jumped in and said no, it's because
11 you don't have an adequate forecast for
12 2021. But as I had mentioned earlier I
13 did not get a quota, and I said this to
14 him in that conversation, I was never
15 given a quota for 2021.

16 Q. Okay. And I believe you had
17 testified before that you only reported
18 to Adam Kimmick; is that correct?

19 A. Correct.

20 Q. And Ms. Lawson was not your
21 supervisor, correct?

22 A. Correct.

23 Q. Do you know who made the
24 decision to terminate your employment
25 from Orange?

1 P. HARAN

2 A. I could speculate, but I don't
3 know if that makes sense to guess, you
4 know, I mean -- I -- I'm not a hundred
5 percent sure who made the decision, but
6 I believe it was Adam Kimmick who made
7 the decision.

8 And I believe that he -- Eddy
9 Youkhanna was also part of that decision
10 process. He was a sales director that
11 Adam reported to.

12 Q. Okay. So he was one level
13 higher than Mr. Kimmick?

14 A. Correct.

15 Q. All right. I'm going to show
16 you a document that will be marked as
17 Haran 9.

18 (Whereupon, Bates OBS381 - 383 was
19 marked as Exhibit 9 for identification,
20 as of April 26th, 2023.)

21 MR. GUILFOYLE: And for the
22 record, this is a document bearing Bates
23 OBS381 through 383.

24 Q. And Ms. Haran, I just ask that
25 you take a moment and review this

1 P. HARAN

2 document.

3 A. Okay.

4 Q. Do you recognize this
5 document?

6 A. Yes.

7 Q. What do you recognize it to
8 be?

9 A. It's a termination letter that
10 I received after -- after I was
11 terminated.

12 Q. Do you recall on what date you
13 received this letter?

14 A. I do not recall exactly what
15 date. It was -- it has the 24th in the
16 letter. I don't know if that's what --
17 it was emailed to me. I don't remember
18 the day that it was emailed to me.

19 Q. And did you receive this
20 letter after your meeting with
21 Mr. Kimmick and Ms. Lawson?

22 A. Yes.

23 Q. Prior to your termination, did
24 you ever feel that your employment could
25 be in jeopardy because of your

1 P. HARAN

2 performance?

3 A. Yes.

4 Q. Okay. Did you discuss that
5 with anyone?

6 A. Yes.

7 Q. Who did you discuss that with?

8 A. Well, the question is who did
9 I discuss the concerns that I had about
10 it being in jeopardy about my
11 employment?

12 Q. Because of your performance.

13 A. Because of my performance.

14 Well, I mean, when we say it
15 was because of my performance, it was
16 also because of the time off, you know,
17 that I was taking and the lack of focus,
18 and the perception that was there. So
19 it wasn't just one thing, you know, it
20 was -- but performance was part of that.
21 So I just want to be careful about how
22 to answer that so that -- because
23 usually it was like a combined
24 conversation. It was sort of like, Hey,
25 the performance is, you know, always an

1 P. HARAN

2 I talked to Marie-Cecile
3 Deraedt about it. I talked to Paul
4 Reticker about it. I talked to Phillipe
5 Melegrito did about it, and I talked to
6 M.J. Hubert about it.

7 Q. Let me show you a document
8 that's going to be marked as Haran 10.
9 (Whereupon, a document was marked as
10 Exhibit 10 for identification, as of
11 April 26th, 2023.)

12 A. Okay.

13 Q. Do you recognize this
14 document?

15 A. I -- yeah, I mean, it's --
16 I've not seen it before, so -- but I
17 recognize, you know, the -- that it's --
18 looks like a Teams chat.

19 Q. Okay. Who is that Teams chat
20 between?

21 A. Myself and Peter Singh.

22 Q. Your email address while at
23 Orange was Patty.Haran@Orange.com?

24 A. Yes.

25 Q. Prior to your termination from

1 P. HARAN

2 MR. GUILFOYLE: I'm going to
3 show you what'll be marked as Haran 11.

4 For the record, it's a document
5 bearing Bates OBS926 through 927.

6 (Whereupon, Bates OBS926 - 927 was
7 marked as Exhibit 11 for identification,
8 as of April 26th, 2023.)

9 Q. I just ask that you take a
10 moment and review that document for me.

11 A. Okay.

12 Q. Do you recognize this
13 document?

14 A. I have not seen this document
15 before, but it appears to be a -- a
16 Teams chat, again, between Peter Singh
17 and myself.

18 Q. And it appears that these were
19 dated February 10, 2021; is that
20 correct?

21 A. Yes.

22 Q. Following being notified of
23 your termination from Orange, did you
24 speak about that termination with any
25 Orange employees?

1 P. HARAN

2 Q. I'll show you what will be
3 marked as Haran 12.

4 (Whereupon, Bates OBS930 - 931 was
5 marked as Exhibit 12 for identification,
6 as of April 26th, 2023.)

7 MR. GUILFOYLE: For the
8 record, it's a two-page document bearing
9 Bates OBS930 through 931.

10 A. Yes.

11 Q. I just ask that you take a
12 moment and review that document and let
13 me know when you've had the opportunity
14 to do so.

15 A. Okay.

16 Q. Do you recognize this
17 document?

18 A. This is the first time I'm
19 seeing this document, but it looks like
20 a text exchange that were a Teams
21 exchange I believe between Xavier Pichon
22 and myself.

23 Q. Okay. And who is Xavier
24 Pichon?

25 A. Global account director at

1 P. HARAN

2 inability to attend a training that he
3 had wanted me to be apart of. So he was
4 aware of my daughter's condition, and he
5 was aware of, you know, the time off
6 that I needed to care for her.

7 Q. And when did you have that
8 conversation with Mr. Youkhanna?

9 A. So I had a -- I don't remember
10 the exact date of the conversation, but
11 it was at some point in between --
12 between September and October before her
13 surgery.

14 Q. And when was your daughter
15 diagnosed with her illness?

16 A. Well, the diagnosis exact
17 date, I don't recall, but it was
18 somewhere in the late-September,
19 early-October timeframe. And it was in
20 a series of discoveries, the diagnosis.
21 It was several different appointments
22 and things, you know, where we got bits
23 of information that added to the
24 diagnosis.

25 Q. And that was in 2020?

1 P. HARAN

2 A. Correct.

3 Q. And who is Peter Singh?

4 A. He's a technical director at
5 Orange.

6 Q. Okay. And what information do
7 you believe Mr. Singh has with regard to
8 your complaint?

9 A. So, he was aware of the
10 increased pressure and stress and
11 scrutiny that I was under about
12 developing my quota and making my
13 numbers. He was aware of -- that -- my
14 daughter's illness, and that -- my
15 belief that there was a connection and
16 that that was something that was, you
17 know, causing the increased pressure.
18 So, yeah, he was aware of all that.

19 Q. Okay. When did you have these
20 conversations with Mr. Singh?

21 A. So, we had the Teams
22 conversations. We also met in person
23 in -- in February. I don't know the
24 exact date, but it was some time in
25 February. We had coffee in New York

1 P. HARAN

2 more quickly through the funnel and
3 close things, you know that coincided
4 with my daughter's, you know, medical
5 activities.

6 Q. Why do you believe the
7 increased pressure that you've mentioned
8 a few times regarding getting sales
9 closed and moving sales quickly, had
10 anything to do with your daughter's
11 condition?

12 A. So, Adam felt that, as I
13 mentioned to your earlier, that I lacked
14 focus and so he'd think -- he thought --
15 his commentary was around the fact that
16 I wasn't as focused on developing, you
17 know, these accounts more quickly, and
18 that I could take off if I needed to
19 take off, but I needed to get this --
20 sales completed. And so, you know, it
21 was just a real lack of -- a lack of,
22 you know, it was kind of just cold and,
23 you know, and unsympathetic like, you
24 know, you've got to get this done.

25 And, you know, I don't

1 P. HARAN

2 really -- it was like stonewalling, you
3 know, any time I talked about, you know,
4 needing time off. It was kind of like,
5 I don't want to hear about that, I just
6 want you to close these sales. And so
7 that's why -- that was the situation
8 that I was experiencing.

9 Q. Okay. Did you believe that
10 your performance expectation should be
11 changed as a result of you needing to
12 take time off to care for your daughter?

13 A. Did I believe that? I thought
14 that I should be -- yeah, I mean given
15 some accommodation to account for, you
16 know, what I was -- what I -- trying to
17 juggle it all. But it was also -- I
18 think that, you know, the expectations
19 were -- the expectations there were --
20 were heightened, you know, during the --
21 all of the episodes around my daughter's
22 condition. It was kind of like, you
23 know, it changed at that time and became
24 more, you know, focused and more, you
25 know, persistent around, you know, the

1 P. HARAN

2 need for me to close those sales.

3 Q. Did those expectations
4 actually change because of your
5 daughter's illness? I'm just trying to
6 understand.

7 MS. FISHER: Objection.

8 BY MR. GUILFOYLE:

9 Q. You can answer.

10 A. I -- you know, it's hard to
11 speculate on what, you know, whether or
12 not -- I just know that it was like, you
13 know --

14 Q. I'm not asking you to
15 speculate, I'm only asking what you
16 know.

17 A. Make sure I understand, repeat
18 the question again.

19 Q. Sure. You had mentioned that
20 you believed expectations changed, and I
21 was asking if you were ever informed
22 that your sales or quota or your numbers
23 changed at any point in 2020?

24 A. No, my numbers didn't --
25 weren't changed in 2020.

1 P. HARAN

2 know, it was -- I don't know the all the
3 exact times of the conversations, but I
4 would say for the most part, yes.

5 Q. All right. And in this
6 lawsuit you have a claim of FMLA
7 interference, how do you contend that
8 Orange interfered with your FMLA rights?

9 A. So, I believe that when I took
10 the time off to care for my mother and
11 my daughter, that that time should have
12 been counted as FMLA. It should have
13 been offered to me as an option at that
14 time and it was not, and it was held
15 against me and, you know, then I was
16 retaliated against by being terminated.

17 Q. Is that all the ways that you
18 believe Orange interfered with your FMLA
19 rights?

20 A. Yeah, I believe so.

21 Q. Did Orange prohibit you from
22 taking any time off for your daughter's
23 procedure and recovery?

24 A. No.

25 Q. Okay. For the days you took

1 P. HARAN

2 off, you used paid time off or PTO; is
3 that right?

4 A. Yeah, sometimes and then
5 sometimes it was just, Just go do what
6 you need to do, you know. So, it was
7 sometimes half days and partial days and
8 things like that. Because I was trying
9 to, you know, juggle it all.

10 Q. You were paid for those days
11 that you took off or the half days you
12 took off as well?

13 A. Yeah, the system doesn't -- I
14 don't think has a way to pay for half
15 days.

16 Q. So you were --

17 A. It was salary not hourly.

18 Q. So for all the days you took
19 off, you were paid for those days?

20 A. Yes.

21 Q. Did Orange prohibit you from
22 taking any time off to take your mother
23 to the eye doctor?

24 A. No.

25 Q. And for the days that you took

1 P. HARAN

2 off or half days that you took off as
3 well to take your mom to the eye doctor,
4 did you use PTO for that?

5 A. Yes.

6 Q. So you were paid for those
7 days off?

8 A. Yes.

9 MR. GUILFOYLE: I'm going to
10 show you what will be marked as Haran 13.

11 (Whereupon, Bates OBS575 - 576 was
12 marked as Exhibit 13 for identification,
13 as of April 26th, 2023.)

14 MR. GUILFOYLE: And for the
15 record, it's Bates OBS575 to 576.

16 Q. I ask that you take a moment
17 and review that document and let me know
18 when you've had the opportunity to do
19 so?

20 A. Okay.

21 Q. Do you recognize that
22 document?

23 A. It looks like a Teams exchange
24 between Adam and I.

25 Q. It appears to be on

1 P. HARAN

2 October 8th of 2020?

3 A. Mh-hm.

4 Q. Okay. And you also have a
5 claim of FMLA retaliation in this case;
6 how do you contend that Orange
7 retaliated against you in violation of
8 the FMLA?

9 A. By firing me.

10 Q. Okay. Is that all the ways
11 that you believe Orange retaliated
12 against you in violation of the FMLA?

13 A. Yes.

14 Q. Did you ever take FMLA leave
15 while at Orange?

16 A. No.

17 Q. Did you ever request FMLA
18 leave while employed at Orange --

19 A. No.

20 Q. -- so if we turn back to
21 Exhibit 7, your Interrogatory Responses

22 --

23 A. Okay.

24 Q. -- so Number 15 there.

25 A. Fifteen?

1 P. HARAN

2 Q. Correct.

3 A. The person --

4 Q. Interrogatory Number 15.

5 There's no page numbers it's a little

6 difficult I appreciate that.

7 A. Number 15 --

8 Q. Do you see that this

9 interrogatory asks you identify each day

10 off work you took to take your daughter

11 to doctor's appointments and for

12 treatment as alleged in the Paragraph 19

13 of the complaint. Do you see that?

14 A. Yes.

15 Q. Do you see your response that

16 identifies October 14th half day,

17 October 15th through the 19th --

18 A. Mh-hm.

19 Q. November 11, December 18,

20 December 28th, December 30, and

21 February 12th; do you see that?

22 A. Yes.

23 Q. Okay. Is that answer

24 accurate?

25 A. I believe so; yeah, to the

1 P. HARAN

2 best of my knowledge.

3 Q. If you turn to response
4 Interrogatory Number 8 within this
5 document.

6 And this interrogatory asks
7 you to identify each employee, agent or
8 representative of defendant who you
9 purport subjected you to discrimination
10 or retaliation; do you see that?

11 A. Mh-hm, yes.

12 Q. And you identified Adam
13 Kimmick and Eddy Youhanna (sic), which I
14 believe should be Youkhanna; is that
15 correct?

16 A. Yes.

17 Q. Okay. Is that answer
18 accurate?

19 A. Yes.

20 Q. Okay. You also have a claim
21 for discrimination under the New York
22 City Human Rights Law; how do you
23 contend that Orange discriminated
24 against you in violation of the New York
25 City Human Rights Law?

1 P. HARAN

2 A. So, my lawyer filed, you know,
3 the details. You know, in summary
4 it's -- it's because of being a
5 caregiver to my mother and my daughter,
6 then needing to have accommodation to
7 take care of them. And I believe that
8 that -- that's -- the contention is the
9 fact that I was terminated in
10 retaliation for taking that time off.
11 It's related to that New York State law
12 that you're referring to.

13 Q. That claim is only for
14 discrimination and not retaliation; are
15 you aware of that?

16 A. Okay.

17 Q. And you mentioned an
18 accommodation; did you ever request an
19 accommodation from Orange?

20 A. So, I didn't. No, I didn't.

21 Q. And when you were hired by
22 Orange, you were already a mother of two
23 children, correct?

24 A. Yes.

25 Q. At the time you were hired by

1 P. HARAN

2 Orange, you were also a daughter to your
3 mother, correct?

4 A. Yes.

5 Q. Other than what you just
6 mentioned, are you there any other ways
7 you believe that Orange discriminated
8 against you based upon your status as a
9 mother?

10 A. No.

11 Q. If you could go back to
12 Exhibit 7, the Interrogatory Responses,
13 specifically Interrogatory Number 8?

14 A. Okay.

15 Q. And do you see that this
16 interrogatory asked you to identify each
17 employee, agent, representative of
18 defendant who you purport subjected you
19 to discrimination or retaliation; do you
20 see that?

21 A. Yes.

22 Q. You identified Mr. Kimmick and
23 Mr. Youkhanna?

24 A. Yes.

25 Q. Is that answer accurate and

113

1 P. HARAN

2 complete?

3 A. Yes.

4 Q. If you could turn to the next
5 page, Interrogatory Number 9. It asks
6 to you identify each and every
7 discriminatory and/or retaliatory
8 comment, behavior or action that you
9 contend defendant or defendant's agents,
10 representatives and/or employees made
11 two or concerning you; do you see that?

12 A. Yes.

13 Q. And do you see your response
14 below?

15 A. Yes.

16 Q. Okay. And is your response --
17 your response to this interrogatory
18 accurate?

19 A. Yes.

20 Q. Is this response complete?

21 A. Yes.

22 Q. Did anyone at Orange ever make
23 any negative comments about your
24 daughter's illness?

25 A. Can you explain what you mean

1 P. HARAN

2 by negative comments?

3 Q. Did anyone at Orange make any
4 disparaging comments about your
5 daughter's illness?

6 A. No.

7 Q. Did anyone at Orange ever make
8 any negative or disparaging comments
9 about you taking days off in connection
10 with your daughter's illness?

11 A. Not specifically about taking
12 days off. It was about the lack of
13 focus.

14 Q. Move to strike.

15 My question was did anyone at
16 Orange ever make any negative or
17 disparaging comments about you taking
18 days off --

19 A. No.

20 Q. -- in connection with --
21 okay.

22 Did anyone at Orange ever make
23 any negative or disparaging comments
24 about your mother's illness?

25 A. No.

1 P. HARAN

2 Q. Did anyone at Orange ever make
3 any negative or disparaging comments
4 about you taking days off in connection
5 with your mother's illness?

6 A. No.

7 Q. During your employment with
8 Orange, did you ever report
9 discrimination or retaliation to anyone
10 at Orange?

11 A. No.

12 Q. Why not?

13 A. I was afraid that I would
14 ruffle feathers if I went and took up my
15 request to human resources, or to higher
16 up the leadership chain. I just thought
17 that it was -- I was already feeling --
18 yeah, so I -- I was afraid to.

19 Q. And you're aware that as part
20 of this lawsuit you're seeking damages
21 in this case?

22 A. Yes.

23 Q. And are you aware of what
24 damages you're seeking here?

25 A. Yes.

C E R T I F I C A T E

I, AMBRIA IANAZZI, a Registered
Professional Reporter, Certified Realtime
Reporter, New York Association Certified Reporter,
New York Realtime Certified Reporter, Certified
Shorthand Reporter and Notary Public in New York
do hereby certify:

That PATRICIA HARAN whose
examination is hereinbefore set forth, was duly
sworn, and that such examination is a true record
of the testimony given by PATRICIA HARAN.

I further certify that I am not
related to any of the parties to this action by
blood or marriage; and that I am in no way
interested in the outcome of this matter.

In witness whereof, I have hereunto set
my hand this 2nd day of May, 2023.



AMBRIA IANAZZI, RPR, CRR, CSR

	2004 22:4	576 107:11,15
-	2005 22:11	
-o0o- 156:7	2006 22:11	6
0	200K 132:14	6 44:2,4 116:7
0 8:2,9	2017 23:18 24:15 26:2 28:22 29:15	7
1	2019 33:12 92:12	7 45:2,4 52:13 71:6,8 92:15 108:21 112:12 127:16
1 25:9 71:24 72:12	2020 27:23 31:15 32:25 33:10,19 34:12,18,22 48:13 55:4,9 74:25 82:23,25 83:2,6,11,15,20 86:12 91:14 103:18 108:2 140:19	8
10 32:14 60:8,10 65:19 92:15 95:6	2021 38:19 54:2 55:12,15 65:19 89:15 123:21 138:14,17 140:16	8 32:14 52:15,17 110:4 112:13
11 23:18 25:12,25 28:21 65:3,7 109:19	2022 122:9 131:11 140:20,24	8th 108:2
11741 9:9	2023 25:10 28:7 29:4 30:24 35:20 44:5 45:5 52:18 56:20 60:11 65:8 69:6 107:13 143:4 147:22	9
12 69:3,5 71:10	24 12:14 54:2 138:17	9 56:17,19 113:5
128,000-dollar 132:7	24th 57:15 67:11,19,25 144:5	90 20:23
12th 109:21	26th 25:10 28:7 29:4 30:24 35:20 44:5 45:5 52:18 56:20 60:11 65:8 69:6 107:13 143:4 147:22	911 143:2,7
13 28:10 107:10,12	28th 109:20	919 147:20,25
14 143:3 147:16	2:08 156:9	927 65:5,6
14th 109:16	3	931 69:4,9
15 108:24 109:4,7 147:17,21	3 23:15,21 24:2 28:25 29:3	94 20:24
150 138:23 139:3	30 34:22 109:20	95 20:24 21:2
15th 109:17	30th 34:17	97 21:2
17 127:17,20	343 30:22 31:3	98 16:17
18 29:15 48:13 109:19 128:4	353 35:18,25	A
18th 48:9	383 56:18,23	A-END 27:2,6,13 83:4 86:22
19 17:22 109:12	4	ability 12:16
1972 17:6	4 30:21,23	access 142:16 144:12,14
1990 18:9	40 48:17	accommodation 81:15 111:6,18,19
1994 18:15 19:18	40-minute 52:3	account 24:18,21 26:22 41:6,11 69:25 77:3 81:15 84:20,22 85:4,8 87:5 88:24 89:9,17,21 90:11 142:17, 18,20,21 144:3 149:9 153:11
1995 21:2	4th 138:13	accounts 26:14,20,21 27:2,6,13,14 33:13 40:25 68:8,14 77:13,17,20 78:5 80:17 83:4,8,9 85:25 86:15,22,23 87:7,22 91:2,3 97:13 145:6 146:4,21 147:3 151:8,18,21 152:7,11 153:6,14
1997 21:2,24	5	accurate 44:21 71:24 109:24 110:18 112:25 113:18 128:13
1999 16:16	5 25:11 35:17,19	
19th 109:17	53 9:8 16:12	
2		
2 28:4,6		
2/24/2021 143:22		
20 16:17 27:22 83:15 123:20		

accurately 12:24
achievement 55:8
acknowledgment 28:15 34:17
acquired 22:2 23:15
acquisition 22:2,4 23:14,19
action 113:8
actions 147:2,7
activities 40:3,18 68:10,13 80:5
145:5 146:18
activity 146:22
Adam 29:19,20 30:17 31:19 32:4,11
33:22 36:12 39:7,12,18 53:19 54:3,25
55:10,18 56:6,11 59:20 66:17 68:19
77:9 79:25 80:12 85:20 87:25 93:11,
14 97:17 99:17,23 100:14 102:14
103:5 107:24 110:12 120:19
Adam's 95:13
add 89:17
added 74:23 126:4
adding 90:11,15
additional 72:3 73:10 83:23 131:12
address 9:7 16:13,24 17:2 60:22
143:25
addresses 16:20
adequate 55:11
administered 10:9
advance 43:20 101:13 117:18
advice 51:17
affect 12:15
affected 50:10
affiliated 127:22
afraid 115:13,18
aftermath 40:8
age 51:19
agent 110:7 112:17
agents 113:9 127:22
Agreement 25:21
agreements 25:2
ahead 47:5 102:17 145:19,20
alleged 109:12
allowed 12:2 48:24

alternatives 94:23
amended 52:8
American 152:13
amount 141:18
ample 33:15
and/or 92:17,20 93:22 113:7,10
announcement 68:20
anti-inflammatory 124:13 125:5
anxiety 119:13,21 120:7 126:17
apartment 17:3
apologize 128:2 145:19 154:3
apologized 50:19
appears 31:16 65:15,18 107:25
applications 134:25
applied 142:4
apply 10:20
applying 131:18
appointment 48:11
appointments 40:7 74:21 109:11
approved 49:8
April 25:10 28:7 29:4 30:24 35:20
44:5 45:5 52:18 56:20 60:11 65:8
69:6 107:13 123:20 138:13 143:4
147:22
architect 88:7,8
archive 136:17
area 131:3
areas 50:3
arrange 48:2
asks 72:12 109:9 110:6 113:5 123:24
127:20 128:5
assessment 39:24 43:9
assigned 34:6 38:18 89:19
associate 54:15
assume 32:2
assuming 118:9
assumption 38:21 39:24
AT&T 22:3
attend 18:16 74:2
attention 31:22 32:14,18 36:14 71:5
116:7 149:13

attorney 9:16 12:3 13:5,9,14,20
14:16 118:20
audible 11:4
availability 123:5
avoid 46:25
aware 74:4,5 75:9,13,18 76:21 77:8,
11 79:16 84:9 85:13,14 86:10 87:20,
23,24 88:4,17 89:5,14 90:5,7,8 93:21
111:15 115:19,23 121:3 140:11
152:24
awareness 79:6

B

B-END 33:13 86:22,23
BA 18:10
Bachelor's 18:3
back 20:24 37:13,15 48:25 52:4
59:18 71:5 85:22 97:25 103:13
108:20 112:11 120:23 126:20 127:2,
15 133:20 144:12,14
backpay 118:15,24
Baker 9:16
balance 22:24 43:18
Bank 151:21
banter 64:8
base 132:5,9
based 38:21 112:8
basic 10:25
basis 116:18,23
Bates 25:8 28:5,10 30:22 31:2 35:18
56:18,22 65:5,6 69:4,9 107:11,15
143:2 147:20,25
bearing 28:10 31:2 56:22 65:5 69:8
143:6 147:25
bears 25:11
beginning 83:13
behavior 113:8
belief 75:15 146:10
believed 37:6 82:20 92:19 93:21
benefits 141:11,12,15,19,22 142:5,
11
big 28:16 29:11

bit 47:8 49:10 78:14 79:20
bits 74:22
Blue 16:25 17:3
board 28:18
boat 51:20
bones 50:3,9
bonuses 140:2
born 17:5,8,9
Boudreau 59:23 66:19 76:7,11 93:2 95:5
Boudreau's 96:13
break 12:6,11 46:25
breaks 12:7
briefing 22:16
Briefly 148:23
bring 31:22 32:13,17 36:13 42:21 71:4 76:16 91:4 116:6 149:12
bringing 42:22 85:3 88:2 91:6,21
Brook 18:12
Brookhaven 17:9
brought 27:11 42:3 47:17
build 38:24 89:15,20
bunch 133:11,13
business 9:18 19:7,11 21:8 23:24 24:6,8 41:13 70:4,9 91:4 137:13,15
businesses 137:19

C

C-A-R 19:21
cadence 123:4
calculate 118:23
calculations 118:13
call 15:3 53:16,18 61:19 62:9 68:20 85:19,21 86:14 127:5 140:18,23 142:8 155:14
called 67:2 85:17 130:17
calls 38:15,16 63:21 90:19 94:15 95:17 96:12 104:12 155:5
Capgemini 85:6 150:3,8,13
Car 19:11,21 20:15,18

card 137:24
care 74:6 81:12 94:11 105:10 111:7 117:9
careful 58:21
caregiver 111:5
caregiving 59:4
case 38:6 45:18,24 98:20 108:5 115:21 116:16 124:9
cases 68:9
Cassandra 92:25 128:11
categorized 117:12
caused 117:15 120:8
causing 75:17
cease 142:5
cellular 137:20,24
cellular-related 138:7
center 22:16
chain 115:16
challenge 33:2 51:4
challenged 64:12
challenges 51:8
chance 144:16
change 26:11,13,16 82:4
changed 26:8,15 81:11,23 82:20,23, 25
charity 47:22
chat 60:18,19 65:16
check 91:18
children 17:15,17 22:20,24 111:23
Christophe 67:7 88:22
Cirrus 9:8 16:12
City 76:2,5 110:22,25
claim 38:7 92:17 105:6 108:5 110:20 111:13
claiming 119:2 124:9 127:11
class 49:3
client 22:12,19 137:9,11 150:25
client-partner 89:25
clients 86:5 127:23 153:5,14
close 22:21 51:9 80:3 81:6 82:2 85:16

closed 41:13 78:8 80:9
closely 84:22
closer 51:18
cloud 88:7,8,11
coaches 40:25
coffee 75:25
coincided 80:3
cold 80:22
collaboration 76:8
college 19:9 51:19
combined 58:23
comment 37:21 113:8
commentary 43:6 80:15 95:14 97:17
comments 32:19,24 36:22,25 40:23 113:23 114:2,4,8,17,23 115:3
commission 139:13,14 144:22,24
commissions 139:4,12
common 61:22 62:16 63:18
communicate 12:3 145:3
communicated 73:24 127:24 149:16,21
communication 94:17 128:24
communications 21:19 23:15 150:16,20
companies 20:4,5 132:24 133:5,6 134:14 149:17 150:6
company 20:17 27:7,17 31:25 43:19 70:13 100:10 130:20 132:25 133:2 140:8,11 145:8
comparable 132:9
compensated 77:18
compensation 132:8,10,12 139:10
compensations 139:5
competing 51:11
complained 92:18
complaint 14:7 44:14 71:15 72:4,15, 24 73:11,22 75:8 76:12 77:6 78:2,17 79:22 84:8,12 85:12 86:8 87:10,19 88:14 89:4,13 90:4 109:13 116:8 127:11,14
complete 113:2,20

completed 18:2 34:21 80:20
complexities 101:17
complies 34:15
computer 144:12,14
concerned 93:18
concerns 58:9
concluded 156:9
conclusions 36:22
condition 74:4 78:10 80:11 81:22
87:23 120:5,6
conditions 73:16,19
confidence 120:2,23 126:24
confidential 152:4
Confidentiality 25:20
confirmation 48:12
conjunction 86:14
connected 137:21
connection 37:8 41:17,22 42:18
43:4 75:15 114:9,20 115:4 127:6
137:25 155:16
constant 61:9 90:25
contact 144:2
contacted 96:6
contacting 61:16
contained 44:20
contempt 120:21
contend 105:7 108:6 110:23 113:9
contention 111:8
contents 32:9
contest 47:22
context 93:24
continued 120:25
contract 41:8 154:25
control 41:20
conversation 15:3 38:12 39:15 43:7
52:2 55:14 58:24 59:8 64:10,20 68:25
74:8,10 79:4 90:25 92:5 93:23 97:6,7
103:4,8 123:23,24 126:21
conversations 13:19 15:13 59:11
62:19 64:24 67:10 68:4,6,8,16 73:15
75:20,22 78:6 93:13 94:12 95:2,16,20
96:4,8,25 98:6,10,12,23 99:6,21

101:3,19,21,23 102:8 103:21 104:7,
10,19,21 105:3 118:20 133:18
135:13,23 136:4,6
copiers 19:25
copies 144:20
copy 46:16 136:12 155:6 156:4
Core 19:20
corner 32:15,16
correct 16:14 32:8,12 36:23 45:21
55:18,19,21,22 56:14 65:20 70:16
75:2 79:11 84:2 93:6 95:25 109:2
110:15 111:23 112:3 121:16,17
129:24 143:19 145:25 146:8 151:2,16
correspond 155:3
correspondence 53:7 129:3,9
counted 105:12
counterclaims 72:18,19 152:25
counts 139:21
court 9:2,6 10:7,15,22 11:5 14:9
44:15 121:13 156:3
courtesy 11:14
coverage 103:5
coworkers 121:5
create 38:20
created 31:17,19,24,25 32:6 33:12
128:17
creating 40:24
credit 100:15,17,19 152:13
current 126:14 138:19 152:17 153:5
customer 22:10 68:13
customers 20:4 137:13,15 153:10
cycle 41:4

D

damages 115:20,24 116:3,4,15,19,
23 117:4,19 119:3 124:9 127:12
128:7
Daniel 76:23
Danielle 59:23 66:21 77:2 93:3 97:4,
5 98:15
data 137:21
date 46:16 50:21 57:12,15 67:12
74:10,17 75:24 76:3 79:17 83:17

91:8,9,13 103:11,14 122:5 125:18
138:17 143:21
dated 28:21 29:14 65:19
dates 19:14 67:14,16,23,25 98:10
121:10
daughter 40:19 50:23 51:20 73:19
74:14 76:18 78:10 81:12 85:18 93:15
94:11 95:13 99:15 102:15 103:12
104:5 105:11 109:10 111:5 112:2
117:9
daughter's 37:8 40:2 41:23 42:7,19
43:5,21 48:20 49:15 73:25 74:4 75:14
76:14 77:12 79:13 80:4,10 81:21 82:5
85:14 87:23 90:7 101:11 105:22
113:24 114:5,10
day 57:18 85:17 103:12 109:9,16
144:5
day-by-day 50:15
days 43:4 105:25 106:7,10,11,15,18,
19,25 107:2,7 114:9,12,18 115:4
de 86:24
deal 100:16,20
dealing 39:25 40:2 42:6,7 49:11
101:18 120:8,17 127:7
deals 51:9 101:13 146:15
dealt 119:15
deaths 126:7
December 109:19,20
decide 18:24
decision 15:24 55:24 56:5,7,9
defendant 9:17 110:8 112:18 113:9
defendant's 25:7 72:17,18,19 113:9
127:22
defenses 72:17,19
defer 122:23 124:17 125:14
degree 18:3,14
demands 51:5
depending 123:5 139:14
depends 139:8
deposition 9:22 10:2,4 11:3,25 13:4,
18,25 14:17,23 15:14 16:3 24:9 46:19
128:18
Deraedt 60:3 66:25 84:19 93:4
101:6,25

describe 119:6
designate 152:3
designing 88:10
details 111:3 121:11
developing 41:10 75:12 80:16
devices 138:2
DGC 86:15 87:7
diagnose 123:14
diagnosed 74:15 121:19
diagnosis 40:8 49:19 50:2 74:16,20, 24 123:12,17
difficult 42:9 49:13 64:7 109:6
direct 20:3
director 29:22 30:2 56:10 69:25 75:4 84:4 85:8 87:6
disagreed 39:23
disciplined 20:14 21:13 22:5,25 23:25
disclosing 13:8
discounted 139:22
discoveries 74:20
discovery 135:15 138:22
discriminated 92:20 93:22 110:23 112:7
discrimination 94:6 110:9,21 111:14 112:19 115:9
discriminatory 113:7
discuss 30:14 42:2 58:4,7,9 62:2 66:12 93:9 95:4 97:3 99:10 101:5 102:10 103:23
discussed 13:9 14:16 66:17,18,19, 20,21,22,23,24 72:5,25 73:12 78:18, 22 79:19 93:10,12 95:23 99:12 101:7 102:13,16 104:2,22 118:16
discussing 91:6,21
discussion 14:24 52:4 97:8 153:21
discussions 90:14 96:14 102:19
disease 50:5
disheartening 96:23
disparaging 114:4,8,17,23 115:3
distress 117:16 119:3,7 121:24
DNA 64:15

doctor 49:2,19 50:5 76:5 106:23 107:3 123:17
doctor's 109:11
document 25:6,13,17 28:9,12,25 29:2,6 30:21 31:2,5,10,12 35:15,22 36:3 43:25 44:3,7,10,13,17,21,24 45:3,7,11,23 46:3,9 52:15,16,20,24 56:16,22 57:2,5 60:7,9,14 65:4,10,13, 14 69:8,12,17,19 99:20 107:17,22 110:5 142:23 143:6,9,14 147:24 148:4
documenter 28:4
documents 13:24 14:3,7 15:19 29:6 118:4,7,10 122:7 124:18,21 128:6 135:7,15,18 138:22 142:9 144:16,19, 21 145:2,3,10,14,23 148:10,12 155:14
drugs 12:14
due 37:7 41:7
duly 8:5
Dupixent 125:4,13,17
duties 137:10 151:4

E

earlier 35:11 42:5 55:12 59:20 73:3 80:13 83:5 100:5 128:15
early 123:20
early-october 74:19
Eddy 56:8 73:21 110:13
educated 19:6
education 18:2 19:5 131:13
educational 18:17
efficient 52:6
effort 146:17,19
efforts 86:16 132:17 135:19 136:23 155:15
Eighteen 17:24
elaborate 40:20
eligible 139:25 144:23
email 60:22 142:20,21 143:18,23,24 144:3 148:13 149:8 155:8
emailed 57:17,18
emails 14:13 53:9 91:10,19 135:2,5 147:12 148:3,22,25 149:4,5,7,18,23

emotional 117:16 119:3,7 121:24 125:20
employed 20:21 61:13 62:6 63:2 67:19 108:18 140:12
employee 28:14 34:17 47:9 110:7 112:17
employees 65:25 66:4,15 113:10 127:21 150:21
employer 70:6,13 137:5
employment 19:14 20:10,15 21:9, 14 23:2 24:2 29:18 30:9 53:14 55:24 57:24 58:11 59:13 61:14,17 94:3 115:7
enabled 41:2
end 20:11 21:9 35:2,7,13 127:19
engaged 62:23
engagement 154:24
engineer 77:23 78:3 87:15,21
enjoyed 150:5
ensure 144:21
ENT 120:9 124:10,24
entertaining 133:17
entire 26:5 63:12
entitled 117:4 118:14 142:4
environment 51:8 96:22
episodes 81:21
essentially 21:22 23:10 137:25
established 49:7
estimate 132:3
evaluation 36:19 38:8 41:25
evaluations 30:11,14
event 47:22
events 42:8
evidence 52:9 100:23
exact 17:2 62:7 67:13,16,22,25 70:12 74:10,16 75:24 83:17 91:8,9,13 103:11,14 105:3 121:10 122:5
examination 9:10 156:8
examined 8:6
examples 41:15
exchange 69:20,21 107:23 129:3
excuse 16:9

executive 22:16 86:4 137:9,11 151:2
exhibit 25:9 28:6 29:3 30:23 35:19
44:4 45:4 46:18 52:8,13,17 56:19
60:10 65:7 69:5 71:6,8 92:15 107:12
108:21 112:12 116:7 127:16 143:3
147:21
exit 66:18
expand 33:14
expectation 81:10 100:12 101:12
expectations 33:4 81:18,19 82:3,20
100:4
experience 35:3
experienced 96:23 97:15
experiencing 51:7 81:8 97:16
explain 113:25
explained 97:7
exploring 33:13
Express 152:13
expressed 126:17
extend 134:14
extended 134:10
extensively 88:19
eye 106:23 107:3

F

fact 59:3 66:8 80:15 92:19 93:21
100:14 111:9
factors 40:16
failure 120:3
fair 62:22 83:18 96:18 101:14 102:5
131:7 136:21
familiarize 148:16
family 92:24 126:4,7 128:10
Fargo 151:23
fax 19:25
feathers 115:14
February 54:2 65:19 67:11,19 75:23,
25 109:21 138:17
federal 71:14
feedback 39:6 100:7
feel 34:9 57:24

feeling 59:12 115:17 121:6
fell 33:4
felt 41:15 80:12 96:21 120:2 121:2
Fernandez 122:12,17 123:11,20
128:11
Fifteen 108:25 147:18
file 121:13
filed 14:8 44:15,18 111:2 118:10
filings 14:10
filled 31:23
fills 32:3
final 100:22
financial 33:11,20 126:9
find 102:25 103:15 140:4
finding 100:9 125:25
fine 141:6 148:8 152:5
finish 11:12
firing 108:9
firm 140:10
first-half 34:25
FISHER 39:13 46:20 47:3 52:10
70:20 82:7 116:20 117:7 128:22
129:2,8,13,17,20 140:25 141:5
147:17 152:2 156:2,5
fit 61:21
fixed 138:4
flurry 133:8
FMLA 105:6,8,12,18 108:5,8,12,14,
17 117:12
focus 37:20,22 38:4,9 39:6,12,18,22
40:5,15,21 43:6,8,13 58:17 80:14
95:11 114:13
focused 41:9,16 80:16 81:24
follow 11:2 141:3 142:11 155:17
forecast 34:3,11 38:17,21 55:11
forecasts 34:4
forget 19:17
forgot 17:2 67:6
formal 18:2 44:14
forms 139:10
forwarded 149:8

Foulon-belkacemi 86:3
found 50:2
France 70:10,12,15 84:21 86:5,15
87:6 88:25 89:10 90:23 92:4,11
freely 12:7
friend 100:10
friends 68:15 130:20
friendship 68:15
friendships 126:11
front 10:21
frustrating 49:13
funnel 38:24 80:2 89:15,16,20 90:13,
16 91:7,21
future 51:17

G

Gal 86:24
gap 141:25
gave 100:5
gears 47:8
general 49:12
generally 132:4
geographic 130:23
German 59:24 66:20 77:22
give 11:13 12:16,20 90:12 100:14,17
147:10 153:17
global 18:21 69:25 84:20 85:8 87:5
88:24
Gmail 149:9
good 9:13,14 22:23 61:21 129:19
govern 9:23 10:18
graduate 18:4,7
graduated 19:8 20:23
grass 64:17
Great 156:2
greener 64:17
ground 9:21 10:25 13:17
group 21:19 86:18 87:7
guess 20:23 23:21 27:22 56:3 62:13
63:3,7 72:9 131:25 132:2

guessing 39:3

Guilfoyle 9:11,12,15 25:15 28:8
30:25 35:16,24 37:12,18 39:8,16
42:13 44:25 46:24 47:6,7 52:5,12
56:21 65:2 69:7 70:17,21,24 82:8
87:2 107:9,14 116:21 128:25 129:5,
11,14,18,22 140:23 141:3,6,8 142:8,
13 143:5 147:14,18,23 152:5 153:19,
23 155:13,19

H

half 31:14 32:25 35:7 106:7,11,14
107:2 109:16

Hames 84:3

Handbook 28:14

handing 68:9

handle 27:5 85:24

handwritten 136:22

Hang 104:15

happened 49:16 50:14 62:21 67:24
120:3

happening 50:13 64:18 102:6 103:2

Haran 9:1,5,13 10:1 11:1 12:1 13:1
14:1 15:1 16:1,6 17:1 18:1 19:1 20:1
21:1 22:1 23:1 24:1 25:1,16 26:1 27:1
28:1,4,11,25 29:1 30:1,21 31:1,4 32:1
33:1 34:1 35:1,17 36:1 37:1 38:1 39:1
40:1 41:1 42:1 43:1 44:1,2,10 45:1,2
46:1 47:1 48:1 49:1 50:1 51:1 52:1,15
53:1 54:1 55:1 56:1,17,24 57:1 58:1
59:1 60:1,8 61:1 62:1 63:1 64:1 65:1,
3 66:1 67:1 68:1 69:1,3 70:1,25 71:1
72:1 73:1 74:1 75:1 76:1 77:1 78:1
79:1 80:1 81:1 82:1 83:1 84:1 85:1
86:1 87:1 88:1 89:1 90:1 91:1 92:1
93:1 94:1 95:1 96:1 97:1 98:1 99:1
100:1 101:1 102:1 103:1 104:1 105:1
106:1 107:1,10 108:1 109:1 110:1
111:1 112:1 113:1 114:1 115:1 116:1
117:1 118:1 119:1 120:1 121:1 122:1
123:1 124:1 125:1 126:1 127:1 128:1
129:1,23 130:1 131:1 132:1 133:1
134:1 135:1 136:1 137:1 138:1 139:1
140:1 141:1 142:1 143:1,8 144:1
145:1 146:1 147:1,16 148:1,2 149:1
150:1 151:1 152:1 153:1,24 154:1
155:1 156:1,9,13

Haran@orange 143:25

hard 64:13 82:10

hardships 126:9

head 11:5 29:22 118:5 138:24

health 73:16,19 139:16

hear 81:5

heard 67:3 68:17

heightened 81:20

held 19:10 98:3 105:14 117:10
136:25 153:21

helped 41:11 51:15

helping 90:10

Hernandez 92:25

Hey 58:24 61:20 64:10 67:3

high 18:4,7 148:23

higher 56:13 115:15

highest 17:25

HIPAA 122:6,24

hired 24:5,12,14,17 111:21,25

hiring 47:17

history 125:20

Holbrook 9:9 16:12

hold 20:6 23:11

Holtsville 17:4

home 22:21 49:17 50:24

homeschooled 49:4

homeschooling 48:23 49:8

honestly 12:24

hope 97:19

hopeful 49:18

hoping 49:22

hospital 49:6 50:24 85:18

Hostetler 9:16

hour 70:18 124:2

hourly 106:17

hours 12:14 13:16 104:24

HR 79:10

Hubert 60:6 67:9 89:23 90:18 91:7
93:5 103:24

human 11:9 47:14 54:14 110:22,25
115:15

hundred 56:4 138:15

Hunter 84:5

husband 14:20,23

husband's 17:13 139:18

hyper 121:3

I

IBM 89:22 90:11,15 91:6,22 133:23

identification 25:9 28:6 29:3 30:23
35:19 44:4 45:4 52:17 56:19 60:10
65:7 69:5 107:12 143:3 147:21

identified 36:14 110:12 112:22
117:5 149:17,22 152:8

identifies 109:16

identify 72:13 109:9 110:7 112:16
113:6 127:21 128:5,10

identifying 37:23

illness 37:9 40:2,8 42:7,19 43:5,22
48:20 74:15 75:14 76:14 79:13 82:5
85:14 90:7 101:11 113:24 114:5,10,
24 115:5

illnesses 41:24 126:3

imagine 136:14

immediately 16:23 130:11

impact 119:17

impacted 119:22

impacts 120:12,13

impasse 41:6,7

improvement 36:18 37:6

inability 74:2

inaccurately 63:8

includes 138:2

including 10:19 138:2

incorrect 126:19,22

incorrectly 62:13

increase 51:6

increased 75:10,17 76:15 77:10
78:7 79:24 80:7 85:15 87:24 90:6
93:10 94:7 95:8,10 97:9 99:14 101:10
102:14 104:4

increasing 59:2

individual 20:4

individuals 64:23 71:12 92:16
104:22 127:21 128:6 149:22

industry 130:19

infection 50:4

infectious 50:5

inflammation 120:12

information 13:19 44:20 51:24
71:13 72:3,14,23 73:7,10,21 74:23
75:6 76:10,14 77:4,24 78:15 79:21,24
84:6 85:10 86:6 87:8,17 89:2,11 90:2
145:12,15,23

informed 38:7 82:21 92:18 93:20

initiative 38:20

input 36:8

inputted 32:11

insomnia 120:16 121:18,20

instance 64:7

instances 61:24

institutions 18:17

instruct 146:25 147:5

insurance 139:16 142:10

integration 77:3,15 97:23

Intelenet 20:19

interested 130:21 153:6

interfered 105:8,18

interference 105:7

international 89:24

Internet 137:23 138:5

Interrogatories 45:15,20 71:7 92:14

interrogatory 71:17,24 72:12 78:25
93:19 95:6 108:21 109:4,9 110:4,6
112:12,13,16 113:5,17 127:16,17,18,
20 128:3

interrupt 11:10

interview 133:22

interviews 132:16,19,22 134:4,10

introduce 46:18

investigation 40:10

invited 53:16,19

involuntary 68:23

involved 47:23 97:13

IOT 137:22

issue 100:6 120:13 121:25 127:3

issues 41:19 48:22

ITHELPDESK@ORANGE.COM
143:19

J

January 27:21,23 49:3 83:6,12,14,20
86:12

Jennifer 54:12,13 55:2 66:23 78:14

jeopardy 57:25 58:10 59:13

job 19:9 21:11,17,18 22:8,9,19 23:5
40:5 42:12 61:3,5,20 63:23 64:2
90:20 93:18 94:24 96:19 102:24,25
120:24 125:25 126:14,18 127:8
130:4,10,24 132:15 133:12 134:9,10,
14,21,25 135:19 136:22 137:10 138:9
140:5 151:4,6 152:17 154:7

jobs 130:12,14,15,25 131:18 136:5,
25

joined 20:18

judge 10:15,21

juggle 42:10 81:17 90:9 106:9

juggling 51:4 59:5 78:11

Julia 17:20,23

July 34:18,22 35:2,13

jump 11:10

jumped 55:10

June 35:11

jury 10:16,22

Justin 9:15

K

key 88:24

kickoff 86:19

kid 104:15

Kimmick 29:19 30:17 31:19 36:12
38:7 40:20 41:21 42:17 53:19 55:18
56:6,13 57:21 59:21 66:17 73:9 85:20
110:13 112:22

Kimmick's 29:20

kind 11:9 15:23 19:5 22:21 26:23
52:4 61:9 64:24 80:22 81:4,22 84:15
86:9 93:15 100:3 104:15 120:20,22
134:24

kinds 133:17

knew 15:20 47:18 76:17 84:12,25
130:18,19

knowledge 45:17 70:5 71:13 72:14,
23 73:17 88:13 110:2 153:8,12

Kyndryl 133:25

L

lack 37:20 38:3,9 39:5,12,18,22
40:21 43:8,13 58:17 80:21 114:12

lacked 80:13

Lacosto 88:6

lamenting 68:16,25

laptops 137:22

larger 34:5 90:12

late 35:8

late-september 74:18

Laurie 86:24

law 10:19 110:22,25 111:11

laws 142:2

Lawson 54:12,13 55:20 57:21 66:23
78:15,16

lawsuit 15:25 44:16 105:6 115:20
119:4 153:2

lawyer 111:2 118:17 135:10

leader 86:17

leadership 115:16

Leading 98:7

learn 53:14

leave 23:20 53:10 102:24 108:14,18

leaving 146:23

led 86:15

left 10:8 27:4,7,25 145:24 150:2

legal 41:5,6,7,19 100:6,9

Lesterson 154:12,16

letter 57:9,13,16,20 154:25

level 17:25 23:14,15,21 24:2 56:12
148:23

Liam 17:20,21

library 33:18

life 125:23 126:5
lines 55:5
LinkedIn 130:16
list 59:18 66:6 70:13 71:11 92:16
listed 45:17 84:14
litigation 135:7 150:17,22
live 16:18
lived 16:12,15,25
LMHC 92:25
log 129:15
long 13:13 16:15 20:6,24 21:23 64:10 125:9,12
longer 125:13
looked 14:6 136:15
Lorna 28:2 83:5
loss 126:11
losses 97:14
lost 117:23 118:2 120:16
lot 73:14 85:2 97:12 148:6
Lou 59:22 66:19 76:7 93:2 95:5,17,23
lower 32:15,16
Lumen 23:16,22 24:3
lunch 129:19

M

M-A-T-E-J-O-V-I-C 16:10
M.J. 60:6 67:9 89:23 92:7 93:5 103:23
M.j.'s 104:13
machines 19:12 20:2
made 22:17 55:23 56:5,6 68:19 85:19 93:21 113:10 134:13
maiden 16:7
maintaining 83:9
major 86:5 87:7 89:9
make 39:2 41:16,17 50:7 55:4 59:6 62:15 82:17 113:22 114:3,7,16,22 115:2 118:19 129:11
makes 42:24,25 43:2 56:3 62:21 120:13

making 15:24 75:12
manage 43:21 90:21 100:8 119:14, 20 120:11,18 124:13 133:12
manager 24:18,22 54:15 76:8 77:3, 15 84:21 87:5 88:24 89:9 97:23 121:5
manager's 32:18,23 36:21,25
managing 40:7
manifestations 121:23
Marie-cecile 60:2 66:25 84:19 93:4 101:6,24
Mark 28:4
marked 25:6,9 28:5,25 29:2 30:21,23 35:19 44:3 45:3 52:15,16 56:16,19 60:8,9 65:3,7 69:3,5 71:5 107:10,12 143:3 147:16,21
marketing 22:15
married 17:11
match 131:20
Matejovic 16:10
matter 9:18 71:14 72:15 116:8 128:7
matters 145:24 146:2
matured 33:15
MBA 18:20,25 131:8
means 33:22,25 151:12
meant 40:21 99:4
medical 77:12 78:10 80:4 121:19 123:16
medically 76:20
medication 12:14 124:5 125:5
medications 124:16,23 125:7,10
meet 30:13 33:10,19 34:11 43:10 48:2 50:20,21 152:22
meeting 53:21 54:4,9,19 57:20 122:21
Melegrito 60:5 67:6 87:13
Mellon 151:22
member 79:10
members 92:24 128:11
memory 48:9
mental 125:20
mentioned 29:7 38:13 39:12,15,18 41:4 42:4 55:12 80:7,13 82:19 83:5 103:3 111:17 112:6 121:18 128:16

131:8 145:16,21 150:24 154:5
message 62:10
messages 98:20
met 48:6,14,17 73:4 75:22 92:3 93:15
method 94:16
metrics 100:21
metro 131:3
MFS 20:19 21:6,16,17
mh-hm 10:12 72:16 83:21 103:7 108:3 109:18 110:11 127:25 128:9
Michel 67:6 88:6
Michelle 47:10,13,14,22 48:2,14 53:8,11 59:19 72:2
middle 116:13
midway 15:10
midwest 30:6
mind 46:6
mine 22:13
minutes 48:18 70:19 147:11 153:17
misquote 124:19
missed 150:12
missing 133:16 139:24 152:15
mitigating 40:16
mixture 148:12
module 83:9 89:18 90:12 91:2
mom 107:3
moment 9:21 35:22 44:7 45:6 56:25 65:10 69:12 107:16
monetary 116:4
money 117:22
month 19:17
monthly 123:8
Moody's 77:19 150:10
Morgan 151:22
morning 9:13,14
mother 14:21,25 42:6 73:20 76:4 94:11 105:10 106:22 111:5,22 112:3, 9 117:9
mother's 37:9 41:23 42:19 114:24 115:5
move 26:22 39:9 42:14 79:25 85:16

<p>114:14</p> <p>moved 150:4</p> <p>moving 37:23 80:9</p> <p>multiple-page 147:24</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>NA 9:18 24:8 70:3</p> <p>Nadine 86:2</p> <p>named 47:9</p> <p>names 16:6 17:19 71:19 87:3 92:21 124:19 133:3,5,6</p> <p>Natalie 67:8 89:8 91:25</p> <p>nature 11:9 63:23 119:7 122:16</p> <p>navigate 41:12</p> <p>needed 36:18 37:6 49:4 74:6 80:18, 19 103:6 144:21 145:4 146:21</p> <p>needing 81:4,11 111:6</p> <p>negative 113:23 114:2,8,16,23 115:3</p> <p>neglect 46:22</p> <p>negotiated 89:16</p> <p>network 88:11</p> <p>Nodding 18:19</p> <p>nods 11:5</p> <p>Non-solicitation 25:21</p> <p>nonresponsive 39:9 42:14</p> <p>northeast 30:6</p> <p>Notary 8:5</p> <p>note 37:4 62:15</p> <p>notes 136:22 150:3,7</p> <p>notice 92:17</p> <p>notified 65:22 67:20 142:15 144:7 146:7</p> <p>November 109:19</p> <p>number 39:3,4 54:24 71:17,24 72:12 92:15,24 95:6 108:24 109:4,7 110:4 112:13 113:5 127:17,20 128:3</p> <p>numbers 75:13 76:16 82:22,24 100:15,18 109:5</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>oath 10:7,9,13,14 71:2 129:24 153:25</p>	<p>Objection 82:7 116:20 117:7</p> <p>objective 43:10</p> <p>objectives 33:11,20</p> <p>OBS 24:9 25:11 28:10 85:9 86:5</p> <p>OBS11 25:8</p> <p>OBS13 28:5</p> <p>OBS334 30:22 31:3</p> <p>OBS344 35:18,25</p> <p>OBS381 56:18,23</p> <p>OBS5 25:8</p> <p>OBS575 107:11,15</p> <p>OBS821 147:20,25</p> <p>OBS910 143:2,6</p> <p>OBS926 65:5,6</p> <p>OBS930 69:4,9</p> <p>obstacle 41:12 100:9,11</p> <p>obstacles 41:3</p> <p>obtain 18:11 138:9 144:15,17,19</p> <p>occasions 38:14</p> <p>occurrence 61:23 62:17 63:18</p> <p>October 43:5 48:9,13 74:12 103:18 108:2 109:16,17</p> <p>offended 40:13</p> <p>offer 61:25 134:14</p> <p>offered 105:13</p> <p>offers 134:10</p> <p>office 47:19</p> <p>onboard 47:18</p> <p>onboarded 29:13</p> <p>onboarding 29:8</p> <p>one-page 28:9</p> <p>onerous 41:19</p> <p>ongoing 14:24 15:2 48:21,22 50:4 51:3,11 64:20</p> <p>online 18:22 131:8</p> <p>opportunities 33:12,14,16 34:10 37:23 61:5 95:19</p> <p>opportunity 10:5 20:13 36:21 69:13 107:18 143:10 148:5,22</p> <p>option 105:13 139:19</p>	<p>options 124:13</p> <p>Orange 9:17 23:24 24:5,8,9,13,20 25:3,22 26:6,13 29:18 30:10 32:7 36:20 45:21 46:12 47:9 53:14 55:25 60:23 61:2,14 62:6 63:2,25 64:2,5 65:23,25 66:3,10,15 70:2,3,4,9,11,14 75:5 76:9 84:5 87:16 88:7,25 89:10, 25 90:22,23 97:22 105:8,18,21 106:21 108:6,11,15,18 110:23 111:19,22 112:2,7 113:22 114:3,7,16, 22 115:2,8,10 121:16 125:24 130:3,6 131:14,20 132:12 134:22 137:2 138:17 141:10 142:17,18 143:24 144:3 145:25 146:12 149:8,19,24 150:21 151:6,14 152:19 153:5,11,14</p> <p>Orange's 152:24</p> <p>Oranges's 92:14</p> <p>order 50:6 90:12</p> <p>ordering 156:4</p> <p>orders 33:6</p> <p>overcome 100:9</p> <p>overlay 77:14 87:21 88:9</p> <p>oversee 90:21</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>p.m. 156:9</p> <p>paid 106:2,10,19 107:6 144:22,24</p> <p>Paine 28:2 83:6</p> <p>paper 28:17</p> <p>papers 29:12</p> <p>paperwork 49:7</p> <p>paragraph 109:12 116:13</p> <p>part 27:3 38:6,8 47:15,17 56:9 58:20 63:22 64:15 79:3 90:20 98:20 105:4 115:19 135:7,15 136:2 146:16 150:16 152:3</p> <p>partial 106:7</p> <p>partner 137:9,11 150:25</p> <p>partnership 33:13</p> <p>parts 50:9</p> <p>pass 41:18</p> <p>past 41:2,12</p> <p>Patricia 9:5 16:6,9 156:8,13</p> <p>Patrick 17:14</p>
--	---	--

Patty 33:2 143:25
Patty.haran@orange.com 60:23
Paul 60:3 67:4 85:7 93:4 102:10,12 103:4,21
Paul's 102:22,23
pay 106:14 117:23 118:2
paying 139:20
pending 12:9 142:25
people 45:16 64:4 66:6,8,9,25 68:6, 10,20 93:20 132:23 145:7 146:17,19
percent 56:5 138:15
perception 58:18
perform 76:16
performance 30:10,14 31:13,18 32:2,6 34:21,25 36:7 37:5 39:19,20 41:24 58:2,12,13,15,20,25 59:15 81:10 86:11,13 87:12 88:3,16,20 89:6
perjury 10:20
persistent 81:25
person 27:16,24 75:22 88:10,12 109:3
personal 149:9
persons 72:13
Perusing 44:8 45:8 52:21
Peter 59:22 60:21 65:16 66:18 67:4 75:3 92:25 93:9,24
Pfizer 41:6 77:19 100:6,16,21
Phillipe 60:4 67:5 87:13
phone 94:15 95:21 96:12 99:19 101:22 104:11,21 137:21 155:5,11
phones 138:3
phrase 38:3
physical 121:23
Physically 54:5
Pichon 66:24 69:21,24 79:20 93:3 99:10 101:3
pick 146:23
pile 28:16 29:11
pipe 33:18
pipeline 33:9 34:3,7,8 37:25 38:25
pizza 73:5
pizzeria 48:3,15

place 67:11,18 73:5 95:16 96:4 103:9 104:23
Plaintiff's 155:15
plan 32:2 38:17,23 139:18,19
plans 137:20,21,22
point 15:8 16:25 17:3 47:25 50:25 74:11 76:19 82:23 83:2 91:12 92:4 123:10 133:18,24
Pons 86:25
poor 121:7
populated 32:4
portfolio 33:15
portion 37:14 39:9
position 19:19,24 20:7 21:3 23:12 24:16 62:25 137:7
positive 86:10,12 87:12 88:16,20 89:6
possession 46:12 72:7,10
possibility 92:6
potential 27:12 50:3 62:2 91:3 136:5
praying 49:22
preceding 16:24 42:8
preexisting 120:5
preparation 13:6,24 128:17 129:7
prepare 13:4
presales 77:23 87:15
prescribed 124:4,24,25
present 54:8 94:25 96:24 99:5 101:2 102:7 103:20 104:18
presented 38:16,23
pressing 59:4
pressure 51:6 59:2 75:10,17 76:15 77:10 78:7 79:24 80:7 85:2,15 87:24 90:6 93:11 94:8 95:8 97:10,11,16 99:14 101:10 102:14 104:4
presume 11:20
pretty 14:8 138:6 150:12 155:10
previous 14:9 38:22 125:19 130:18
previously 78:13 79:19 83:10,24
primarily 130:20,25 150:13 155:5
prior 44:18 45:24 57:23 59:10 60:25 63:24 79:5 83:20 92:4 98:15

priorities 51:12
privilege 129:15
privileged 13:21 128:23
prize 47:23 48:3,7
problem 52:7
procedure 105:23
process 36:20 51:21 56:10 135:16
produce 135:20
produced 98:19 135:6 150:15,22
producing 135:8
production 128:21 129:16 140:19, 24 141:7 142:9,12 155:14,18
products 137:14,17 151:15
professional 121:20
program 18:22 131:8,10
progressively 37:24
prohibit 105:21 106:21
promoted 87:6
pronouncing 154:11
properly 11:21
Proprietary 25:20
prospect 91:6
provide 54:17
provided 54:21 145:12,14 148:11
providing 146:11
PTO 106:2 107:4
Public 8:6
pull 144:25
pulled 144:25 148:13
purchase 139:19
Purdue 18:21 131:9
purport 110:9 112:18
purpose 9:22 68:3
purposes 11:2 100:21 118:15 145:22
pursuing 18:20
put 14:6 92:7 129:14 141:2

<p style="text-align: center;">Q</p> <p>qualified 33:9,18</p> <p>question 11:11,12,16 12:9,10 37:10 39:11 42:16 58:8 59:9 66:7 72:11,22 82:18 102:18 114:15 116:5,25 126:22 142:25 147:4</p> <p>questions 10:6,7 11:20 12:2 148:14, 18</p> <p>quickly 76:17 80:2,9,17 101:14</p> <p>quota 34:5,11 38:18,22 55:5,9,13,15 64:19 75:12 82:22 89:18 100:15,18 137:13</p> <p>quotas 152:22</p> <p>quote 55:6</p>	<p>107:21 143:13 148:25 149:3</p> <p>recognized 86:11,18</p> <p>recollection 64:22 124:23 134:3</p> <p>recommended 49:2</p> <p>record 9:3,20 24:7 28:9 31:2 35:17, 25 56:22 65:4 69:8 107:15 135:11 136:11 143:6 147:24 153:20,22</p> <p>recorded 126:16</p> <p>records 46:17 91:19 103:15 121:12 122:24,25 125:15 133:21 134:20,24 136:13 138:25</p> <p>recovering 49:17</p> <p>recovery 40:9 105:23</p> <p>recruited 23:23 47:16</p> <p>recruiter 61:12,15,19,25 62:18,24 140:6,7 154:5,25 155:4,16</p> <p>recruiters 61:8,16 130:17</p> <p>refer 91:10 145:11</p> <p>reference 84:16 86:9 87:11 88:16,21</p> <p>referenced 73:23</p> <p>referred 121:25 129:5</p> <p>referring 24:7 27:25 111:12 118:8</p> <p>refresh 14:10</p> <p>regain 119:25 120:22 121:4 142:16</p> <p>regard 75:7 76:11 77:5,25 78:16 84:7 85:11 86:7 87:9,18 89:3,12 90:3 93:9 95:6,14 97:4 99:11 102:11 103:24</p> <p>region 30:3 91:4</p> <p>regions 30:6</p> <p>regular 78:5 90:19 95:17,19</p> <p>regularly 77:9 79:23 84:24</p> <p>related 40:4,17 45:17 50:17 95:20 111:11 119:13 126:23</p> <p>relating 124:8 128:6 135:18 142:9 155:15</p> <p>relation 50:13</p> <p>relations 90:22</p> <p>relationship 41:10</p> <p>release 15:18 122:7,25 124:21</p> <p>released 85:18</p> <p>relocate 131:5</p> <p>remember 20:20 57:17 63:9 74:9</p>	<p>98:16 133:7,15 135:8,11 154:19</p> <p>remembering 134:7</p> <p>remotely 131:3</p> <p>removed 100:11</p> <p>rep 19:22 21:4,6,21 22:18 23:10</p> <p>repeat 37:10 82:17</p> <p>repercussions 117:20</p> <p>rephrase 11:18</p> <p>report 29:17 30:7 115:8</p> <p>reported 29:19 55:17 56:11</p> <p>reporter 9:2,6 10:8 11:6 37:15 156:3</p> <p>reporting 123:19</p> <p>represent 9:17</p> <p>representative 110:8 112:17</p> <p>representatives 113:10 132:25 133:4</p> <p>request 53:10 85:20 108:17 111:18 115:15 128:20 129:12,16 141:7 142:12 155:18</p> <p>requested 15:18 27:9 37:14</p> <p>reschedule 51:2</p> <p>resign 83:11</p> <p>resigned 20:12 21:10 26:19 27:4,16 83:6,22</p> <p>resources 47:15 54:14 115:15</p> <p>respect 86:21 99:24 147:2,8</p> <p>respond 36:21</p> <p>responded 42:22</p> <p>response 11:4 39:17,22 71:16,23 92:15,23 93:16 94:18 96:14 101:25 102:22,23 104:13,14 109:15 110:3 113:13,16,17,20</p> <p>responses 45:19 46:13 71:6,11 92:13 108:21 112:12 127:16</p> <p>responsibilities 19:24 21:5 26:12 27:2 40:6 42:11 59:5 78:9 83:3,20,24 90:9 151:6</p> <p>responsibility 83:7 90:21</p> <p>responsible 30:5 77:16 83:10 137:12 152:20 153:15</p> <p>result 81:11 126:13,18 132:16 134:9</p> <p>results 33:3 88:2</p>
<p style="text-align: center;">R</p> <p>ran 140:9</p> <p>range 132:7</p> <p>rating 36:16,17 37:6 43:3,11</p> <p>reached 62:24 153:4,13</p> <p>reaching 62:18</p> <p>read 32:22 37:12,15 71:18 92:21</p> <p>real 80:21</p> <p>realistic 101:15,16</p> <p>reason 12:20,23 46:8,11 54:17,24</p> <p>reasons 54:20,23</p> <p>recall 13:11 16:2 24:25 27:18,20 28:19 34:20 53:23 54:7 55:2 57:12,14 59:10 62:7,11 63:4,14,15 64:7,25 67:13,15,22,25 74:17 83:16 91:8,9,15 92:8 94:14,16 96:3,11 98:9 103:11,13 104:10 118:4 121:10 122:5 123:19 124:15 125:18 128:18 131:9,21,24 132:11 135:14 141:20,21 142:2 145:9,13 150:9 154:7</p> <p>receive 30:10 57:19 139:4,7 140:15, 20 141:10</p> <p>received 57:10,13 142:4</p> <p>receiving 59:2 79:25 85:16 87:25 93:11 119:19 141:22</p> <p>recess 70:23 129:21 147:13</p> <p>recognize 25:16 28:11,13 29:5,9 31:4,9 36:2,5 44:9 45:10,13 52:23 53:2,5,7 57:4,7 60:13,17 65:12 69:16</p>		

resume 155:6,9
retaliated 92:20 93:22 105:16 108:7, 11
retaliation 93:25 94:5 108:5 110:10 111:10,14 112:19 115:9
retaliatory 113:7
Reticker 60:4 67:4 85:7 93:5 102:11, 12
return 49:2
returning 129:9
revenue 33:3
review 13:23 14:12 31:13,18 32:2,6 34:21 36:7,9 37:5 38:12 39:19,21 44:7,17 45:7,23 56:25 65:10 69:12 71:15,20 107:17 148:3,9,22
reviewed 14:5 128:16 129:6
reviews 34:25
rights 25:20 105:8,19 110:22,25
Road 9:8 16:12,25 17:3
Robert 67:8 88:23 89:3
Rocco 47:10 48:2,6 53:8,11 59:19 72:2,6,23
role 21:20 22:18 23:8 26:5 62:2 84:18 151:5
roles 26:8
Romero 59:25 66:21 77:22,25
roughly 20:22 123:2
ruffle 115:14
rule 13:17
rules 9:21,23 10:18,25

S

Saint 86:24
salary 106:17 131:16,20,21 132:6 138:19 139:11
sales 19:21 20:3 21:4,6,21 22:18 23:10 29:22,23 30:2 34:3,4,10 41:3 43:20 51:7 55:7 56:10 61:4 64:15 78:3,7 79:25 80:8,9,20 81:6 82:2,22 84:4 85:3,16 86:16,19 87:6,21 89:16 90:15 91:7,21 95:19 130:14 137:12 146:19 152:20
salespeople 61:23
salesperson 63:19

Samsung 152:12
scare 76:20
scholarship 51:21
school 18:5,8 48:23,25 49:11 51:16
schools 49:12
scope 130:23
scrutiny 75:11 94:8 95:10 100:7 101:9 102:15
search 130:15,24 132:16 134:21 135:19 136:23 155:15
secondary 18:16
seek 18:24 131:12
seeking 115:20,24 116:16 117:22,25
self-confidence 119:23 127:3
self-induced 127:4
sell 33:14 139:9,14 151:13
selling 19:25 21:7 137:13,14,18,20, 22
send 62:9
sender 143:17
sending 46:23 135:9 155:9
sense 42:24,25 56:3 62:21
sentence 33:7 37:25
sentences 32:23
separated 151:7
separation 125:24 131:14 134:21 137:2 141:9 149:18,23
September 74:12 122:8 131:11
series 74:20
served 45:24
serves 48:9
service 138:4,5
services 9:18 21:8 23:24 24:6,8 70:4,9 77:3,15,16 97:23 137:15,18,23 146:11 151:15 153:7
session 10:11 13:6
sessions 15:10 122:18
set 83:19 151:9,10
Shaman 154:12,23 155:16
share 51:23
shared 15:19,21 51:25 59:19

short 22:10 33:5 70:23 129:21 147:13
show 25:5 28:3,24 30:20 35:14 43:24 44:23 52:14 56:15 60:7 65:3 69:2 107:10 122:25 142:22 147:15
sic 110:13
side 70:11
sign 29:12 41:8 46:9,10,16
signature 25:25 28:20 29:10,14 46:3,13
signed 24:25 25:22 28:17 29:7 100:20 122:25
SIM 137:24
Simal 22:11
similar 76:20 152:18
simultaneous 29:25 70:7 135:3 145:17
Singh 59:22 60:21 65:16 66:18 75:3, 7,20 93:2,9,24 94:13 95:2
Singh's 94:18
single 67:24
sinus 120:13 121:24
sinuses 120:6
Sitting 134:2
situated 48:24
situation 77:12 79:12 81:7 94:21 96:17 102:4 117:21 120:19 124:14
situations 120:16
sleep 120:16
small 22:20,24
social 49:5 51:14,15
sold 77:18
solution 151:9,10
solutions 88:11
son 51:18
sort 14:24 26:18 41:14 47:21 50:15 53:10 58:24 64:20 68:16,24 139:25 141:10
sorts 138:2
sought 122:17 142:16
sound 122:9
space 19:6

speak 12:3 13:13 14:22 63:25 65:24
speaking 29:25 47:19 70:7 135:3 145:17
specific 24:19 30:3 32:10 64:23 68:12 98:9 134:3 145:9
specifically 28:19 38:3 95:5 112:13 114:11
specifics 64:25 92:9 94:14,16 98:16
speculate 56:2 82:11,15
speculating 33:22
spend 124:2
spin 133:25
spoke 15:7 48:18,19 49:14 67:5,6,7, 8,9,14,16 77:9 79:23
spoken 27:12 95:24
spokesperson 79:8
Stanley 151:22
start 91:5 121:8 123:25 130:9
started 19:15 25:2,22 26:25 125:16 128:15 130:4,11 131:9 138:13 141:21 142:6
state 8:6 9:2 63:7 111:11 141:11 142:2,10
stated 16:11
statement 42:5 100:22
States 28:15 30:4
status 112:8
stay 64:11,18
stayed 22:4
stemming 127:3
step 22:17 85:24
steps 118:23
steroids 124:25 125:11
stock 139:19
stonewalled 93:16
stonewalling 81:2 99:25 120:20
Stony 18:12
stop 88:4
stopped 122:3
stress 15:23 75:10 119:14,17,21 120:12 125:20 126:13,17 127:5

stressors 125:23 126:4
strike 39:9 42:14 114:14 128:2 132:20 140:19
struggle 50:17 51:12
stuff 104:6
subject 71:14 72:15 94:9 121:7
subjected 110:9 112:18
submit 136:10
submitted 136:9 138:21 139:2
submitting 135:14
subset 77:16
substance 36:9
successful 40:24
sufficient 33:10,19 34:9 38:25 39:2
Suisse 152:13
summary 111:3
supervisor 55:21
support 88:10
supported 78:4 87:22
supposed 50:20
surgery 40:9 49:16,21,23 73:25 74:13 103:13
Switching 47:8
sworn 8:5
sympathetic 94:20 96:16 97:19 102:3
system 106:13 142:17

T

T-MOBILE 126:18 133:9 134:15 137:6,8 138:10,20 140:2,5,13,16,21 142:6 151:2,5,14,19 152:7,18,22 153:7 154:6
T-Mobile's 137:14,18
tablets 138:3
takes 137:24
taking 26:25 41:22 42:18 50:18 58:17 67:11 94:10,24 95:12 104:23 105:22 106:22 111:10 114:9,11,17 115:4 124:12 125:6,17
talk 13:10 48:15 61:22 63:21 66:7 99:13 120:25 122:19

talked 15:11 39:21 49:10 50:16 51:3, 5,13,21 59:17,19,20,21,22,23,24 60:2,3,4,5 73:3,14 78:6,8,14 81:3 84:10,23 90:23 93:17 94:4,6,22 95:8, 9 99:13,14 101:8,10,12 133:14 134:8
talking 16:3 124:2
target 33:5 34:11
targets 152:21
tax 140:16
team 47:17 84:5 86:17,20
teaming 68:12 146:16
teams 60:18,19 65:16 69:20 75:21 98:21,22 99:3,21 101:23 104:9 107:23 146:14
technical 24:24 75:4 88:9,10
technologies 22:12 23:17 138:8
technology 130:14
Telecom 23:7
telecommunication 21:7
Teleport 21:18,23,24
templates 32:5
ten 36:15 70:18
tenure 26:5,18 63:12
term 99:3 125:13
termed 39:2
terminate 55:24
terminated 53:15 55:3 57:11 59:11 66:9,11 67:3 68:21 95:25 105:16 111:9 117:14 121:16 144:4
termination 54:18 57:9,23 60:25 63:24 65:23,24 66:13 67:21 68:23 79:3,9,17 94:2,4 95:9,23 98:8 120:4 130:3,5 138:16 141:24 142:15 144:8 146:8
terms 51:7 86:15 101:8
territory 33:3
testified 8:7 55:17
testify 12:25
testimony 10:19 12:16,21 154:7
text 36:9 69:20 98:15,19,25
texts 135:25 136:2,3
that'll 52:12
therapist 14:20 15:6,13 119:25

<p>121:2,9,14 122:4,11 123:14 124:7 126:16</p> <p>therapy 15:9 119:9,10,13 122:18,19</p> <p>Theron 67:8 89:8 91:22,23</p> <p>thing 15:4 26:23 43:19,20 53:21 58:19 63:20 95:7 104:16</p> <p>things 11:6 15:23 22:24 48:19 61:9 64:11,14 68:14 74:22 78:17 80:3 85:17 91:11,19 100:4,5 102:17 103:25 106:8 119:12,14 124:19 135:13,23 136:16 137:23 139:12,21 144:23 151:12</p> <p>thinks 34:7</p> <p>thought 22:22 40:13 43:9 61:10 80:14 81:13 115:16</p> <p>thoughts 15:22</p> <p>three-and-a-half 13:15</p> <p>Thursday 13:12</p> <p>tied 59:3</p> <p>time 12:7 19:16 20:25 21:14 22:6,10 23:21 26:13,24 27:10 31:7 37:7 41:22 42:18 43:14 47:25 49:19 50:18,25 53:11 58:16 61:13 62:5,20 63:5,9 67:20 69:18 74:5 75:24 76:4,19 81:3, 4,12,23 83:12,14 87:25 88:19 93:12 94:10,24 95:12 97:9,18 99:15 102:15 103:6,17 104:4 105:10,11,14,22 106:2,22 111:10,25 117:8,12,17 119:16 129:19 130:2 134:8 136:10 141:23 142:14 146:6,12 148:3,9</p> <p>timeframe 27:23 74:19 103:16</p> <p>timeline 14:5 128:17,21,22 129:6</p> <p>times 26:17 49:13 61:17 62:8 63:11, 15,16,17 80:8 105:3</p> <p>title 24:19,24 29:21 54:16 97:21,24 98:2</p> <p>titles 21:21 26:9,10</p> <p>today 10:20 12:17,21,25 72:5,25 73:12 78:18 134:2</p> <p>today's 10:11 13:4,24 14:16,23 16:3</p> <p>Todd 84:3,4</p> <p>told 48:20,21 49:9,14,21,24 50:11 51:14,23 68:19 73:3,18 79:4,16 85:20 94:19 103:4</p> <p>top 32:19 118:5 138:24</p> <p>total 119:10 132:7,10,11</p>	<p>training 74:2 131:13</p> <p>transcript 152:4</p> <p>transition 68:7 145:4,24 146:2,22,24</p> <p>transitioning 145:6 146:13 147:3,8</p> <p>travel 92:10</p> <p>treatment 99:16,23 102:13 104:3 109:12 119:19 121:7 122:17</p> <p>tress 120:7</p> <p>trust 121:4 126:25</p> <p>turn 25:24 34:13 108:20 110:3 113:4 116:10 127:15 128:3</p> <p>TW 23:6,13</p> <p>two-page 69:8</p> <p>twofold 59:8</p> <p>type 15:3 53:21 68:16,25 123:4 124:13 125:4</p> <p>types 124:12 130:12 137:17</p> <p>typical 34:24</p> <p>typically 34:4 35:6</p> <p>typo 76:25</p> <hr/> <p>U</p> <hr/> <p>U.S. 25:21 90:22</p> <p>uh-huhs 11:5</p> <p>ultimately 23:21 48:6</p> <p>unaware 79:14</p> <p>understand 10:16,23 11:7,17 44:12 70:25 82:6,17 83:19 116:5 117:2 129:23 153:24</p> <p>understanding 9:19 33:25 34:2</p> <p>understood 11:21</p> <p>underway 15:16 68:10 145:5</p> <p>unemployment 141:11,15,18,22 142:3,10</p> <p>unfair 99:18,24 100:3,12 101:8</p> <p>United 28:15 30:4</p> <p>University 18:12,21</p> <p>unlock 144:3</p> <p>unrealistic 100:3</p> <p>unsympathetic 80:23</p>	<p>urgent 37:22</p> <p>utilizing 153:7</p> <hr/> <p>V</p> <hr/> <p>Vaguely 28:13</p> <p>varied 21:22</p> <p>vary 139:15</p> <p>venture 63:7</p> <p>verification 46:22</p> <p>verifying 134:20</p> <p>Verizon 133:14 134:17</p> <p>violation 108:7,12 110:24</p> <p>virtual 53:21</p> <p>visits 50:5</p> <p>VP 86:4</p> <hr/> <p>W</p> <hr/> <p>W-2 140:15,20,24</p> <p>wanted 15:16 19:4 74:3 144:11,15, 19,20,25 145:2,22</p> <p>ways 105:17 108:10 112:6</p> <p>Webex 53:20</p> <p>websites 130:21</p> <p>Wednesday 13:12</p> <p>week 13:6 85:23 141:25</p> <p>weekly 15:3 38:14,16 53:18 78:6 123:3,4</p> <p>Wells 151:22</p> <p>what'll 65:3</p> <p>Willins 59:24 66:22 76:23 77:2,5 93:3 97:4,5,21 98:6 99:7</p> <p>wireless 138:4</p> <p>WITNES 9:5</p> <p>woman 77:2 83:22</p> <p>won 47:23</p> <p>wondering 70:8</p> <p>word 98:25 135:17</p> <p>words 34:8</p> <p>work 23:23 26:20 27:15 43:17 84:10, 16 85:4,22 86:11,19 87:12 88:16,20</p>
---	--	---

89:6 104:16 109:10 119:18,24 120:9
131:2,3

worked 19:11 22:10,11 66:10 70:15
77:13,21 84:21 119:12 151:24 152:6,
12

worker 49:5 51:14,15

working 25:2 26:15 27:13 50:18
86:20 88:18 89:6,15 90:8 95:18
104:23 125:3 126:24 130:22 133:10
142:6 146:14,15,20 150:5 151:19,20

works 97:20 138:6

worse 120:14

worsened 120:6

wound 133:9

wrap 153:18

writing 10:10 94:13 96:9 98:13,18
101:20 102:20 104:8 129:12 136:7
141:2,4 142:11 155:17

written 78:21,23

wrong 40:11 154:11

wrote 53:6 149:6

X

Xavier 66:24 69:21,23 79:20 93:3
99:10

Y

year 17:5 18:13 20:9 38:22 64:19
83:13 122:8 140:16

years 15:8 16:17 20:20 23:11,18
27:11 47:20 119:10 136:20

York 8:6 9:9 17:4,10 75:25 76:5
110:21,24 111:11 131:2 142:2,10
151:22

Youhanna 110:13

Youkhanna 56:9 73:22 74:8 110:14
112:23